

DOCKET FILE COPY ORIGINAL

**BELLSOUTH**

Robert T. Blau, Ph.D, CFA  
Vice President - Executive and  
Federal Regulatory Affairs

EX PARTE OR LATE FILED

Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351  
202 463-4108  
Fax: 202 463-4631

November 3, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Washington, DC 20554

RECEIVED  
NOV - 8 1997  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte in CC Docket 97-208 and RM-9101

Dear Mr. Caton:

This is to inform you that on October 31, 1997, Gary Epstein, and Karen Brinkmann, both of Latham & Waktins, along with Whit Jordan, Bill Stacy, and the undersigned, all of BellSouth, met with Jordan Goldstein, Robb Tanner, Brent Olson, David Kirschner, Michael Pryor, Jake Jennings, Radhika Karmarkar, Florence Setzer, and Daniel Shiman, all of the Commission, for two meetings. These ex parte meetings were in the above referenced proceedings.

The purpose of the first meeting was to respond to questions from Commission staff regarding BellSouth's OSS specifically to clarify certain technical and implementation issues set forth in its filing.

The purpose of the second meeting was to discuss how BellSouth has adopted and committed to performance measures. The attached presentation was distributed and discussed during this meeting.

Pursuant to Section 1.1206(a)(2) of the Commission's rules, two copies of this notice are being filed with the FCC. Due to the lateness of the meetings, these ex partes are being filed today. Please associate this notification with the above-referenced proceedings.

Sincerely,



Robert T. Blau

Attachment

cc: Jordan Goldstein  
Robb Tanner  
Daniel Shiman

Jake Jennings  
Brent Olson

Radhika Karmarkar  
David Kirschner

Florence Setzer  
Michael Pryor

No. of Copies rec'd  
List ABCDE

0+3

**BELLSOUTH  
TELECOMMUNICATIONS, INC.**

**SERVICE QUALITY MEASUREMENTS (SQM)**

**Ex Parte**

### PURPOSE OF THIS EX PARTE:

This Ex Parte addresses how BellSouth has adopted and committed to performance measures which:

(1) compare BellSouth's performance in providing and maintaining services to its resale customers, Competitive Local Exchange Carriers (CLECs), with similar services BellSouth provides to its retail customers;

(2) measure BellSouth's performance in providing and maintaining unbundled network elements to its wholesale customers;

(3) compare BellSouth's performance in providing and maintaining local interconnection services to CLECs' customers with services provided to retail customers;

and to measure performance as a necessary prerequisite to demonstrating compliance with the following provisions of Section 251 (47 U.S.C. Section 251):

### RESALE:

"Offer for resale at wholesale rates any telecommunications service that "BellSouth provides" at retail to subscribers who are not telecommunications carriers" and will "not impose unreasonable or discriminatory conditions or limitations on, the resale of such telecommunications services".

### UNBUNDLED ACCESS:

"Provide to any requesting telecommunications carrier for the provision of a telecommunications service nondiscriminatory access to network elements on an unbundled basis at any technically feasible point based" on rates, terms, and conditions that are just, reasonable, and nondiscriminatory".

### (LOCAL) INTERCONNECTION:

Provide "interconnection" "for the facilities and equipment of any requesting telecommunications carrier", with BellSouth's local exchange network "that is at least

equal in quality to that provided by "BellSouth" to itself or to any subsidiary, affiliate, or any other party to which" BellSouth provides interconnection" based on rates, terms, and conditions that are just, reasonable, and nondiscriminatory".

BellSouth believes that its existing performance measurements are more than adequate to allow the Commission to verify that it is providing CLECs with facilities and services in accordance with each of these requirements and will continue to do so. This document addresses BellSouth's proactive efforts to develop wholesale measurements and retail comparative measurements, and BellSouth's contractual commitment to performance measures through individual CLEC agreements.

This document will present, in matrix form (figure 1), BellSouth's response to the Service Quality Measurements (SQMs) presented by the Local Competition Users Group (LCUG) in its September 29, 1997 Ex Parte.

#### BELLSOUTH'S FORMAL DATA COLLECTION AND MEASUREMENT PROCESS

To enable effective ongoing production of measurements which monitor parity and provide meaningful data on a readily available basis, BellSouth has implemented a Data Warehouse. BellSouth's existing Operating Support Systems (OSSs) are run on mainframe computers and have multiple processors. An example of this is the Work Force Administration ("WFA") system. WFA, which is used for provisioning and maintenance of designed services, has seven computer processors. The query systems on the mainframe computers cannot be easily manipulated to produce the measurements required to monitor parity between retail and wholesale customers. The Data Warehouse was developed to meet this need.

Information in the Data Warehouse is loaded from multiple mainframes and combined into regional databases. Orders processed by BellSouth for both its retail units and its CLEC customers are captured for analysis. Standard Query Language ("SQL") queries are written against the databases to produce the measurements. These SQL queries provide the ability to re-create measurements that are currently in place on the mainframe systems, and the SQL queries can separate the retail and wholesale services results for reporting purposes (see figure 1).

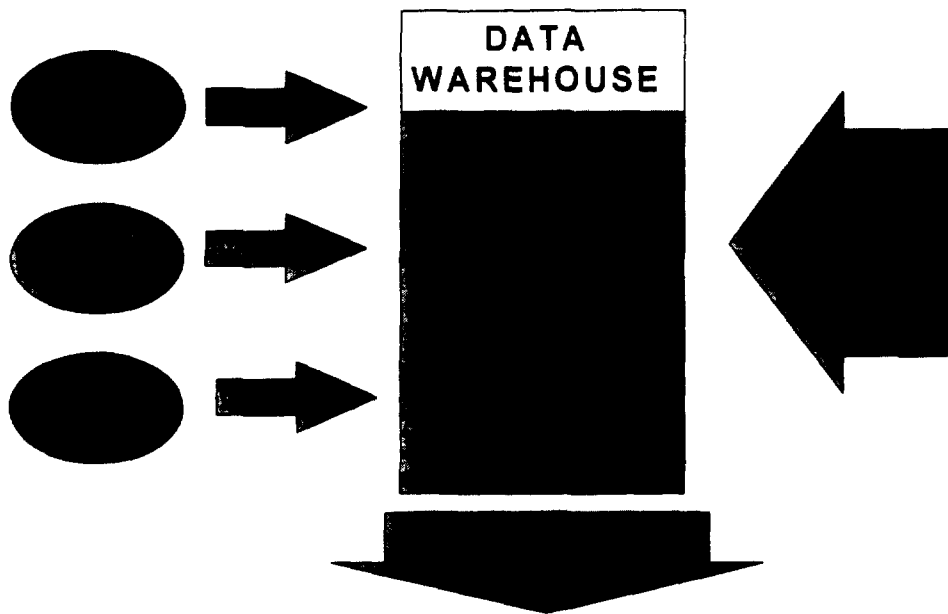


Figure 1

BellSouth plans to provide CLECs with access to the Data Warehouse where CLEC specific results can be obtained, although security and data partitioning requirements are not yet complete.

BellSouth has utilized the data in the Data Warehouse to produce reports in two different formats as negotiations with CLECs have progressed. These formats are:

- (1) Contractual Measurements - Those measurements contractually agreed to thus far with AT&T (5/9/97), Time Warner (9/24/97) and US South (9/18/97).
- (2) Permanent Measurements - A set of generally available measures based on the contractual measurement set, with some additions, and offered to further demonstrate BellSouth's commitment to performance measures.

BellSouth took an aggressive approach to creating a baseline set of measurements to enable the monitoring of levels of service provided to CLECs, while the development of a full scope of measurements proceeded. Initial measurements became available in March 1997 using February 1997 performance data. By collecting and monitoring these measurements, BellSouth had the ability to identify, analyze, and address any perceived issues. BellSouth has also produced and utilized the reports in various public service commission activities and hearings.

## LOCAL COMPETITION USERS GROUP (LCUG)

On September 26, 1997, the LCUG published a Service Quality Measurements Detail Document, Version 6.0; associated with a Petition for Expedited Rulemaking (RM9101). This document outlines LCUG's proposed Service Quality Measurements. Figure 2 identifies BellSouth's position on each of the measurements in the LCUG document, addressed at a high level, with a reference to the appropriate BellSouth Exhibit supporting that measurement.

Figure 3 is an expanded matrix identifying all of the measurement reports proposed at this time by LCUG and represents approximately 1,044 monthly reports. It is BellSouth's position that to provide this level of granularity on a monthly basis is both unreasonable and counterproductive to both BellSouth and the CLECs and is not in keeping with the true intent of Section 251, of the Act.

## COMPARISON OF BELL SOUTH'S PERMANENT MEASUREMENTS WITH BELL SOUTH'S RETAIL UNIT MEASUREMENTS:

Figure 4 is a matrix which compares BellSouth's permanent measurements with those measurements we are providing for our retail business units. These retail business unit measurements have been developed by BellSouth through long years of successfully meeting the expectations of our retail customers by providing excellent quality and service. This is substantiated by the selection of BellSouth for the J.D. Powers award for "Outstanding Customer Service".

BellSouth believes the overall objective of performance measurements is to insure that a CLEC's customers receive the same quality service that BellSouth offers its retail end users.

BellSouth's existing measures (Figure 4) are obviously adequate to insure this high level of customer service. ***Shouldn't a similar set of measures be adequate for the CLEC's customers?*** To expand these measurements to include the 1,044 measurement reports as proposed by LCUG is ridiculous in both scope and necessity and would complicate the measurement process beyond "meaningful" information.

## SUMMARY:

BellSouth established early in 1997 that it would not only provide services to its CLEC customers in a nondiscriminatory fashion, but that it would also collect data to demonstrate this fact. BellSouth believes that its existing performance measurements are more than adequate to allow the Commission to verify that BellSouth is providing CLECs with facilities and services in accordance with all aforementioned requirements and will continue to do so.

In the book "Bridge to Quality", published in 1993 by the Compass Consulting Group, Inc., are the following statements:

*"There are those who will use data analysis to manipulate the original data so that it supports their emotive position. Data should be analyzed to learn from the system, not to "prove" something or to support a position".*

*"Whenever data is collected from a system, we must find means to make it useful. We must summarize the data in a way that can be easily understood and yet retains the important information from the original data set".*

BellSouth believes that it has summarized the measurement data into reports that are both easily understood and retain the important content of the data. To explode these measurements beyond this scope would destroy the meaningful content of the measurements.

**Figure 2**  
**LCUG Measurement Matrix with Comments**

CATEGORY	FUNCTION	BELLSOUTH COMMENTS	EXHIBIT REFERENCE *
<b>Pre-Ordering (PO)</b>			
PO - 1	Average Response time for Pre-Ordering information	Yes, currently measured	Exhibit WNS-37 <sup>(2)</sup>
<b>Ordering and Provisioning (OP)</b>			
OP - 1	Average Completion Interval	Yes, currently measured, not broken down by major service family	Exhibit WNS-10 <sup>(1)</sup>
OP - 2	Percent Orders Completed on Time	Yes, provisioning Appointments Met, not broken down by major service family	Exhibit WNS-9, WNS-2 <sup>(1)</sup>
OP - 3	Percent Order Accuracy	Yes, currently measured on mechanized orders, not broken down by major service family	Exhibit WNS-41 <sup>(2)</sup>
OP - 4	Mean Reject Interval	Yes, Reject/Error Notice Measurement currently produced by CLEC, not a parity measurement, not broken down by major service family	
OP - 5	Mean FOC Interval	Yes, measurement currently produced by CLEC, not a parity measurement, not broken down by major service family	
OP - 6	Mean Jeopardy Interval	Not measured at this time, not applicable to Resale	
OP - 7	Mean Completion Interval	Yes, currently measured, not broken down by major service family	Exhibit WNS-10 <sup>(1)</sup>
OP - 8	Percent Jeopardies Returned	Not measured at this time, not applicable to Resale	
OP - 9	Mean Held Order Interval		
OP - 10	Percent Orders Held >= 90 Days		
OP - 11	Percent Orders Held >= 15 Days		
<b>Maintenance and Repair (MR)</b>			
MR - 1	Mean time to Restore	Yes, maintenance avg. duration, receipt to clear hours, not broken down to all LCUG Standard Service Levels and Disposition and Causes	Exhibit WNS-9 <sup>(1)</sup> WNS-2 <sup>(1)</sup>
MR - 2	Repeat Trouble Rate	Yes, maintenance Repeat Troubles, 30 day, not broken down to all LCUG Standard Service Levels and Disposition and Causes	Exhibit WNS-9 <sup>(1)</sup>
MR - 3	Trouble Rate	Yes, % Trouble Report Rate, not broken down to all LCUG Standard Service Levels and Disposition and Causes	Exhibit WNS-9 <sup>(1)</sup>
MR - 4	Percentage of Customer Troubles Resolved Within Estimate	Not currently measured. Not applicable to Specials	
<b>General (GE)</b>			
GE - 1	Percent System Availability	Yes, system availability measurements are generally in place for mainframe legacy systems accessed by the local competition interfaces.	Exhibit WNS-36 <sup>(2)</sup>
GE - 2	Mean Time to Answer Calls	Yes, currently measured on Legacy system access (RNS, LENS)	Exhibit WNS-37 <sup>(2)</sup>
GE - 3	Call Abandonment Rate		
<b>Billing (BI)</b>			
BI - 1	Mean Time to Provide Recorded Usage Records	In a Resale or UNE environment, the AMA recording has no identifiers to distinguish CLEC usage from BellSouth usage. However, BellSouth can provide usage data.	Exhibit WNS-40 <sup>(2)</sup>
BI - 2	Mean Time to Deliver Invoices		
BI - 3	Percent Invoice Accuracy		
BI - 4	Percent Usage Accuracy		
<b>Operator Services and Directory Assistance (OS, DA)</b>			
OS/DA - 1	Mean Time to Answer	Currently measured for the State Commissions	



Network Performance (NP)			
NP - 1	Network Performance Parity	Currently measured by a combination of end user trouble reports and network reports	Exhibit WNS-9 <sup>(1)</sup> WNS-11 <sup>(1)</sup> WNS-12 <sup>(1)</sup> WNS-13 <sup>(1)</sup> WNS-14 <sup>(1)</sup>
Interconnect/Unbundled Elements and Combos (IUE)			
IUE - 1	Function Availability		
IUE - 2	Timeliness of Element Performance		

\* References are to: W.N. Stacy's exhibits filed as part of FCC Docket 97-208 and are referred to as:

(1) Affidavit of William N. Stacy dealing with Performance Measures

(2) Affidavit of William N. Stacy dealing with Operating Support Systems

LOCAL COMPETITION USERS GROUP

PROPOSED SERVICE QUALITY MEASUREMENTS REPORTS (1044)

PRE-ORDERING																
AVERAGE RESPONSE INTERVAL																
Due Date Reservation	X															
Feature Function Availability	X															
Facility Availability	X															
Street Address Validation	X															
Service Availability Info.	X															
Appointment Scheduling	X															
Customer Service Records	X															
Telephone Number	X															
Rejects of Failed Queries	X															
		MAJOR SERVICE FAMILY														
		Resold Residence	Resold Business	Resold Residence	Resold Business	Resold Centrex/ Ctix-like	Resold PBX Trunks	Resold Chann. T1 Service	Other Resold Services	UNE Platform	UNE Channelized DS1	Unbundled DS0 Loop	Unbundled DS1 Loop	Other Unbundled Loops	Unbundled Switch	Other UNEs
		POTS	POTS	ISDN	ISDN											
ORDERING & PROVISIONING																
MEAN COMPLETION INTERVAL																
New Service Installations		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Service Migrations w/o chg.		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Service Migrations w/ chg.		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Moves & Changes Activities		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Feature Changes		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Service Disconnects		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
PERCENT COMPLETED ON TIME																
New Service Installations		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Service Migrations w/o chg.		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Service Migrations w/ chg.		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Moves & Changes Activities		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Feature Changes		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Service Disconnects		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
PERCENT ORDER ACCURACY																
		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
MEAN REJECT INTERVAL																
New Service Installations	X															
Service Migrations w/o chg.	X															
Service Migrations w/ chg.	X															
Moves & Changes Activities	X															
Feature Changes	X															
Service Disconnects	X															
MEAN FOC INTERVAL																
New Service Installations	X															
Service Migrations w/o chg.	X															
Service Migrations w/ chg.	X															
Moves & Changes Activities	X															
Feature Changes	X															
Service Disconnects	X															
MEAN JEOPARDY INTERVAL																
New Service Installations	X															
Service Migrations w/o chg.	X															
Service Migrations w/ chg.	X															
Moves & Changes Activities	X															
Feature Changes	X															
Service Disconnects	X															
MEAN COMPLETION INTERVAL																
New Service Installations	X															
Service Migrations w/o chg.	X															
Service Migrations w/ chg.	X															
Moves & Changes Activities	X															
Feature Changes	X															
Service Disconnects	X															

**LOCAL COMPETITION USERS GROUP**  
**PROPOSED SERVICE QUALITY MEASUREMENTS REPORTS (1044)**

<b>PERCENT JEOPARDIES RETURNED</b>																
New Service Installations	X															
Service Migrations w/o chg.	X															
Service Migrations w/ chg.	X															
Moves & Changes Activities	X															
Feature Changes	X															
Service Disconnects	X															
<b>MEAN HELD ORDER INTERVAL</b>																
No Facilities		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
No Equipment		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Workload		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Other		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<b>PERCENT ORDERS HELD &gt;= 90 DAYS</b>																
No Facilities		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
No Equipment		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Workload		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Other		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<b>PERCENT ORDERS HELD &gt;= 15 DAYS</b>																
No Facilities		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
No Equipment		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Workload		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Other		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<b>MAINTENANCE &amp; REPAIR</b>																
<b>MEAN TIME TO RESTORE</b>																
Out of Service - No Dispatch		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Out of Service - Dispatch		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Hold Open for Monitoring		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CPE Trouble - Incl. inside wire		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
No Trouble Found		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Central Office Equipment		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Interoffice Facilities		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Loop/Access Line		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
All Other Troubles		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
No Access		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<b>REPEAT TROUBLE RATE</b>																
Out of Service - No Dispatch		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Out of Service - Dispatch		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Hold Open for Monitoring		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CPE Trouble - Incl. inside wire		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
No Trouble Found		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Central Office Equipment		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Interoffice Facilities		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Loop/Access Line		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
All Other Troubles		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
No Access		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<b>TROUBLE RATE</b>																
Out of Service - No Dispatch		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Out of Service - Dispatch		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Hold Open for Monitoring		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
CPE Trouble - Incl. inside wire		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
No Trouble Found		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Central Office Equipment		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Interoffice Facilities		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Loop/Access Line		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

LOCAL COMPETITION USERS GROUP

PROPOSED SERVICE QUALITY MEASUREMENTS REPORTS (1044)

All Other Troubles	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
No Access	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
<b>ESTIMATED TIME TO RESTORE MET</b>																												
Out of Service - No Dispatch	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
Out of Service - Dispatch	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
Hold Open for Monitoring	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
CPE Trouble - incl. inside wire	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
No Trouble Found	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
Central Office Equipment	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
Interoffice Facilities	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
Loop/Access Line	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
All Other Troubles	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
No Access	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X												
<b>GENERAL</b>																												
<b>PERCENT SYSTEM AVAILABILITY</b>																												
Interface Type	X																											
Business Period	X																											
<b>MEAN TIME TO ANSWER CALLS</b>																												
By Support Center Provided	X																											
<b>CALL ABANDONMENT RATE</b>																												
By Support Center Provided	X																											
<table border="1"> <tr> <td></td> <td>End User Direct BIN</td> <td>End User Alternate BIN</td> <td>Access</td> <td>TSR</td> <td>UNE</td> </tr> </table>																		End User Direct BIN	End User Alternate BIN	Access	TSR	UNE						
	End User Direct BIN	End User Alternate BIN	Access	TSR	UNE																							
<b>BILLING</b>																												
<b>TIMELINESS OF RECORD DELIVERY</b>																												
Mean Time to Provide Record Usage	X	X	X																									
Mean Time to Deliver Invoices	X	X	X																									
<b>ACCURACY OF BILLING RECORDS</b>																												
Percent Usage Accuracy				X	X																							
Percent Invoice Accuracy				X	X																							
<b>OPERATOR SERVICES AND DIRECTORY ASSISTANCE</b>																												
<b>MEAN TIME TO ANSWER</b>																												
OS - Machine Answer Time	X																											
OS - Human Answer Time	X																											
DA - Machine Answer Time	X																											
DA - Human Answer Time	X																											
<table border="1"> <tr> <td></td> <td>Subscriber Loop Loss</td> <td>Signal to Noise Ratio</td> <td>Idle Channel Ckt.Noise</td> <td>Loop - Circuit Balance</td> <td>Circuit Notched Noise</td> <td>Attenua- tion Distortion</td> <td>Dial Tone Delay</td> <td>Post Dial Delay</td> <td>Call - Comp Delivery Rate</td> <td>Ntwk Incid. &gt;5000 Block Calls</td> <td>Ntwk Incid. &gt;100,00 Block Calls</td> </tr> </table>																		Subscriber Loop Loss	Signal to Noise Ratio	Idle Channel Ckt.Noise	Loop - Circuit Balance	Circuit Notched Noise	Attenua- tion Distortion	Dial Tone Delay	Post Dial Delay	Call - Comp Delivery Rate	Ntwk Incid. >5000 Block Calls	Ntwk Incid. >100,00 Block Calls
	Subscriber Loop Loss	Signal to Noise Ratio	Idle Channel Ckt.Noise	Loop - Circuit Balance	Circuit Notched Noise	Attenua- tion Distortion	Dial Tone Delay	Post Dial Delay	Call - Comp Delivery Rate	Ntwk Incid. >5000 Block Calls	Ntwk Incid. >100,00 Block Calls																	
<b>NETWORK PERFORMANCE</b>																												
<b>NETWORK PERFORMANCE PARITY</b>																												
Transmission Quality	X	X	X	X	X	X																						
Speed of Connection							X	X	X																			
Reliability										X	X																	
<b>AVAILABILITY OF NETWORK ELEMENTS</b>																												
<b>AVAILABILITY OF NTKW. ELEMENTS</b>																												
By Unique UNE or UNE Combo employed	X																											

### Performance Measurements Comparison Matrix CLEC vs BST Business Units

	CLECs		BELL SOUTH TELECOMMUNICATIONS, INC.			
	RESALE	FACILITY BASED	SMALL BUSINESS	CONSUMER	BELL SOUTH BUSINESS SYSTEMS	
PROVISIONING						
Order Reject/Error Notice	X	X				
FOC	X	X				
% Provisioning Appointments Met -		X	POTS	POTS	POTS	
Residence Dispatch Out	X					
Residence Non-Dispatch	X					
Business Dispatch Out	X					
Business Non-Dispatch	X					
Specials	X	X			X	
% Report Rate			X	X	X	
Residence Dispatch Out	X					
Residence Non-Dispatch	X					
Business Dispatch Out	X					
Business Non-Dispatch	X					
Specials					X	
% Appointment Windows Met				X		
Total Number Existing Unbundled Loops		X				
# Unbundled Loop Orders		X				
MAINTENANCE						
Total Troubles		X				
% Maintenance Appointments Met -		X	POTS	POTS		
Residence Dispatch Out	X					
Residence Non-Dispatch	X					
Business Dispatch Out	X				X	
Business Non-Dispatch	X				X	
In by 3, cleared same day				X		
In by 3 by Network, cleared same day			X			
Maintenance Average Duration (Rct. to Clr)		X				
Residence Dispatch Out	X					
Residence Non-Dispatch	X					
Business Dispatch Out	X					
Business Non-Dispatch	X					
Rct. to Pending Cleared (< 30 min., 30-45 min., 45-60 min., > 60 min.)			X	X	X	
Pending Dispatch to Clear			X	X	X	
Special Services Average Duration	X				X	
% Maintenance Repeat Troubles, 30 days		X	POTS	POTS	POTS	
Residence Dispatch Out	X					
Residence Non-Dispatch	X					
Business Dispatch Out	X					
Business Non-Dispatch	X					
Specials	X				X	
% Trouble Report Rate		X	POTS	POTS	POTS	
Residence Dispatch Out	X					
Residence Non-Dispatch	X					
Business Dispatch Out	X					
Business Non-Dispatch	X					
Specials	X					
Failure Rate - Specials					X	
% Provisioning Troubles w/ 30 days of install.		X			POTS	
Residence Dispatch Out	X					
Residence Non-Dispatch	X					
Business Dispatch Out	X					
Business Non-Dispatch	X					
Specials	X				X	
% Out of Service < 24 Hours						
Residence Dispatch Out	X					
Residence Non-Dispatch	X					
Business Dispatch Out	X					
Business Non-Dispatch	X					
Specials	X					
Average Answer Time (RRC)	X	X				
LOCAL INTERCONNECTION TRUNKING						
% Provisioning Appointments Met	X					
% Provisioning Troubles, 30 Days	X					
Maintenance Average Duration (Rct to Clr)	X					
% Trouble Report Rate	X					
TOTALS	48	13	8	9	15	